

2205 Forestside Drive
Arlington, MD 21001
October 16, 2000

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U.S. Food and Drug Administration
Dockets Management Branch

We are writing to ask an end to the downed animal
trade.

Please grant Farm Sanctuary's petition to prohibit
the slaughter of downed animals. Docket number is
98P-0151/CP1.

Honor & Patricia Boole

98P-0151

C 2351

USDA Says "No Downers" in School Lunch Program

This summer, the USDA's Agricultural Marketing Service (AMS) reviewed and revised its policy regarding the purchase of ground beef for the National School Lunch Program (beginning in School Year 2000-2001) and other federal food and nutrition programs, and it has taken a major step in the direction of ending the downed animal trade. According to an agency statement, "USDA will no longer accept ground beef that includes product from non-ambulatory cattle, commonly known as 'downers'."



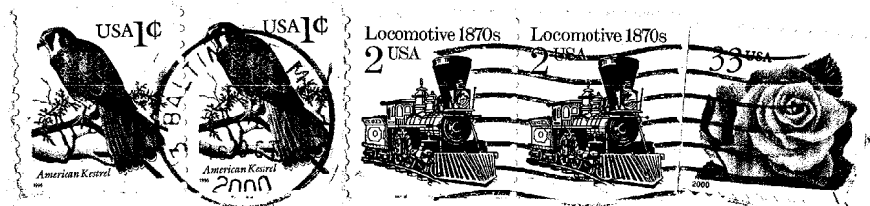
Carcasses originating from cattle which must be processed in accordance with *FSIS Directive 6900.1R1 - Humane Handling of Disabled Livestock*, issued November 2, 1998, must be segregated to assure that the product from these carcasses is not included in the USDA purchased ground beef."

This development shows a growing consensus—even among industry and government officials—that the marketing and slaughter of downed animals causes intolerable animal suffering and poses an unnecessary risk to human health.

- Animals who are too sick or injured even to stand should not be allowed to enter the human food chain.
- In addition to posing an increased risk for bacterial contamination, there is evidence that some downed animals may be afflicted with a form of BSE (Bovine Spongiform Encephalopathy or "Mad Cow Disease"), a disease which has been linked to a fatal human illness (CJD or Creutzfeldt-Jakob Disease).
- It is practically impossible to move downed animals humanely, and they are typically pushed with tractors or dragged with chains—inhumane processes which cause injuries ranging from bruises and abrasions, to broken bones and torn ligaments.
- Downed animals comprise a very small percentage of animals slaughtered, and prohibiting their marketing will cause no undue economic hardship.
- Industry experts have estimated that 90% of downed animals can be prevented with better care and handling. Removing the market for downed animals will provide an incentive for the industry to prevent downed animals in the first place.



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